

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz &amp; Schneid, P.L.</b> 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys for Secured Creditor  Miriam J. Rosenblatt, Esq. (MR-7505)	
In Re:  James Walter Lucas and Barbara Jean Lucas,  Debtors.	Case No.: 16-32586-VFP  Chapter 11  Hearing Date: June 29, 2017 at 10:00 a.m.  Judge: Vincent F. Papalia

**SUPPLEMENTAL RESPONSE IN SUPPORT OF MOTION FOR RELIEF AND  
OBJECTION TO THE AUTHORIZATION OF THE  
INTERIM AND FINAL USE OF CASH COLLATERAL**

**COMES NOW**, Ocwen Loan Servicing, LLC, as Servicer for Deutsche Bank National Trust Company, as Trustee for the Registered Holders of CBA Commercial Assets, Small Balance Commercial Mortgage Pass-Through Certificates, Series 2007-1 (the “Secured Creditor”), by and through its undersigned counsel, and submits this Supplemental Response in Support of Motion for Relief and Objection to Debtor’s Motion for Entry of an Order Authorizing the Interim and Final Use of Cash Collateral (“Debtors’ Motion”) and respectfully states as follows:

1. On May 5, 2017, at a hearing held on the Secured Creditor’s Motion for Relief from Stay, the Court advised the parties to enter into an Interim Order pending the conversion of the case from Chapter 13 to Chapter 11 of the Bankruptcy Code.
2. The Court promulgated terms for the Interim Order, as follows:

- a. Debtor shall tender adequate protection payments in the amount of \$2,741.59 for the months of April May, and June.
  - b. Within three (3) days of receipt of disbursed monies held by the Chapter 13 Trustee the Debtor must pay \$7,000 to Secured Creditor.
  - c. The above mentioned payments in paragraph a. and b. must be made by 06/13/2017. The payments are without prejudice to either side.
  - d. Debtor shall file a cash collateral motion no later than 06/13/2017.
3. Debtor's counsel was provided with an Interim Order containing these terms on May 24, 2017. The Secured Creditor made follow-up attempts with Debtor's counsel on the status of executing the Interim Order on June 7, 2017 and June 13, 2017.
4. Debtor's counsel advised that more time was needed to file the Motion for Cash Collateral and all parties subsequently agreed to an adjournment of the Motion for Relief hearing.
5. To date, no executed copy of the Interim Order has been received from the Debtor's counsel nor has the Debtor made any of the necessary payments as identified in the Interim Order.

**WHEREFORE**, Secured Creditor, requests that his Honorable Court enter an order granting the Secured Creditor's Motion for Relief and denying the Debtor's Motion, and for any such further relief as this Honorable Court Deems Just and appropriate.

Dated: June 27, 2017

Robertson, Anschutz & Schnied, P.L.  
Attorneys for Secured Creditor  
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By: /s/ Miriam J. Rosenblatt  
MIRIAM J. ROSENBLATT, Esquire  
NJ Bar Number: MR 7505

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz &amp; Schneid, P.L.</b> 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number: 561-241-6901 Attorneys For Secured Creditor  MIRIAM J. ROSENBLATT (MR 7505)	CASE NO.: 16-18507-VFP  CHAPTER 11  <b>SUPPLEMENTAL RESPONSE IN SUPPORT OF MOTION FOR RELIEF AND OBJECTION TO THE AUTHORIZATION OF THE INTERIM AND FINAL USE OF CASH COLLATERAL</b>
In Re:  James Walter Lucas and Barbara Jean Lucas,  Debtors.	

**CERTIFICATION OF SERVICE**

1. I, MIRIAM J. ROSENBLATT, represent Ocwen Loan Servicing, LLC, as Servicer for Deutsche Bank National Trust Company, as Trustee for the Registered Holders of CBA Commercial Assets, Small Balance Commercial Mortgage Pass-Through Certificates, Series 2007-1 in this matter.
2. On June, 27, 2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Supplemental Response in Support of Motion for Relief and Objection to the Authorization of the Interim and Final Use of Cash Collateral.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 27, 2017

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By:/s/Miriam J. Rosenblatt  
Miriam J. Rosenblatt, Esq.  
NJ Bar Number MR - 7505

<b><u>Name and Address of Party Served</u></b>	<b><u>Relationship of Party to the Case</u></b>	<b><u>Mode of Service</u></b>
Scott J. Goldstein, Esq. Law Offices of Scott J. Goldstein, LLC 280 Wet Main Street Denville, NJ 07834	Attorney for Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  _____ (as authorized by the court*)
James Walter Lucas 884 Sanford Avenue Irvington, NJ 07111	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  _____ (as authorized by the court*)
Barbara Jean Lucas 884 Sanford Avenue Irvington, NJ 07111	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  _____ (as authorized by the court*)
US Trustee US Department of Justice Office of the US Trustee One Newark Center, Suite 1401 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  _____ (as authorized by the court*)